1 2 3 4 5 6 7 8 9	ADAM H. SPRINGEL, ESQ. Nevada Bar No. 7187 NAKESHA S. DUNCAN-PEREZ, ESQ. Nevada Bar No. 11556 CHAD D. FUSS, ESQ. Nevada Bar No. 12744 SPRINGEL & FINK LLP 9075 W. Diablo Drive, Suite 302 Las Vegas, Nevada 89148 Telephone: (702) 804-0706 E-Mail: aspringel@springelfink.com								
11									
12	UNITED STATES DISTRICT COURT								
13	STATE OF NEVADA								
14	***								
15	GUISELA AGUIRRE GUERRA,	Case No.: 3:18-cv-00376-LRH-CLB							
16	Plaintiff,								
17	VS.	STIPULATION TO EXTEND TIME TO FILE							
18	DEMATIC CORP., a Delaware Corporation; DOES 1-25; and BLACK CORPORATIONS A-Z,	DEMATIC CORPORATION'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DEFENDANT DEMATIC CORP.'S FINANCIAL STATEMENTS AND							
19									
20	Defendants.	FOR SANCTIONS (DOCUMENT 124)							
21	DEMATIC CORP., a Delaware Corporation,								
22	Third-Party Plaintiff,								
23	VS.								
2425	SALLY BEAUTY SUPPLY, LLC F/K/A SALLY BEAUTY COMPANY, INC.,								
26	Third-Party								
27	Defendant.								
28	///								
I	I and the second								

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24

STIPULATION TO EXTEND TIME TO FILE DEMATIC CORPORATION'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DEFENDANT DEMATIC CORP.'S FINANCIAL STATEMENTS AND FOR SANCTIONS (DOCUMENT 124)

Pursuant to Local Rule IA 6-1, the Parties, by and through their respective, undersigned, attorneys of record, stipulate and agree that the deadline for DEMATIC CORPORATION's response to PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DEFENDANT DEMATIC CORP.'S FINANCIAL STATEMENTS AND FOR SANCTIONS (DOCUMENT 124) filed on February 10, 2022 shall be extended to February 28, 2022.

This is the first request for an extension. It is made due to an ongoing trial Dematic's counsel has been involved in from February 14, 2022 to February 23, 2022 and thus not being able to complete it by the current deadline. This request only seeks a 2 court day extension. It is not intended for an improper purpose or to cause delay, but is made in good faith after discussions between the aforementioned counsel of record.

IT IS SO STIPULATED.

DATED this 25th day of February, 2022.

SPRINGEL & FINK LLP

/s/ Chad D. Fuss, Esq.

ADAM H. SPRINGEL, ESQ.

Nevada Bar No. 7187

NAKESHA S. DUNCAN-PEREZ, ESQ.

Nevada Bar No. 11556

CHAD D. FUSS, ESQ.

Nevada Bar No. 12744

9075 W. Diablo, Suite 302

Las Vegas, Nevada 89148

Attorneys for Defendant/Third-Party Plaintiff

DEMATIC CORP.

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DATED this 25th day of February, 2022.

LAW OFFICE OF STEVEN P. BRAZELTON

/s/ Steven P. Brazelton, Esq.

Steven P. Brazelton, Esq. 520 Holcomb Avenue Reno, Nevada 89502

Attorney for Plaintiff GUISELA AGUIRRE GUERRA

ORDER

Based on the parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that the briefing deadlines on DEMATIC CORPORATION's response to PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DEFENDANT DEMATIC CORP.'S FINANCIAL STATEMENTS AND FOR SANCTIONS (DOCUMENT 124) are extended pursuant to the parties' stipulation.

Dates this <u>25th</u>ay of <u>February</u>, 2022.

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE 1 Guerra v. Dematic Corp., et al. U.S.D.C. Case No.: 3:18-cv-00376 2 3 4 Pursuant to FRCP 5(b), on February 25, 2022 the foregoing document entitled: STIPULATION TO EXTEND TIME TO FILE DEMATIC CORPORATION'S RESPONSE TO PLAINTIFF'S MOTION 5 TO COMPEL PRODUCTION OF DEFENDANT DEMATIC CORP.'S FINANCIAL STATEMENTS 6 AND FOR SANCTIONS (DOCUMENT 124) was served via electronic service through the United 7 States District Court for the District of Nevada's ECF system and pursuant to Rule26(a)(1) on the 8 following parties: 9 10 Telephone: No.: (775) 826-2380 Steven P. Brazelton, Esq. 11 Law Office of Steven P. Brazelton Facsimile No.: (775) 826-2386 601 S. Arlington Avenue 12 Reno, Nevada 89509 E-Mail: 13 sbrazelton@brazeltonlaw.com dbmckean@brazeltonlaw.com Attorney for Plaintiff 14 GUISELA AGUIRRE GUERRA 15 Telephone No.: (775) 827-6440 Jack G. Angaran, Esq. 16 Alice K. Herbolsheimer Lewis, Brisbois, Bisgaard & Smith, LLP E-Mail: 17 5555 Kietzke Lane, Suite 200 jack.angaran@lewisbrisbois.com alice.herbolsheimer@lewisbrisbois.com 18 Reno, Nevada 89511 sherie.morrill@lewisbrisbois.com 19 Attorney for Third-Party Defendant SALLY BEAUTY SUPPLY 20 2.1 22 /s/ Ella Wilczynski By: 23 An employee of SPRINGEL & FINK LLP 24 25 26 27 28

From: Steve Brazelton
To: Chad D. Fuss

Cc: Ella Wilczynski; GuerravDematicCorpetalZ6182496@projects.filevine.com; Nakesha Duncan-Perez

Subject: Re: Guerra - Motion to Compel Financial Records

Date: Friday, February 25, 2022 1:07:58 PM

Yes, stip is fine.

On Thu, Feb 24, 2022 at 4:38 PM Chad D. Fuss < cfuss@springelfink.com > wrote:

Steve-

Can we put your signature on the attached Stipulation?

Thank you.

Chad D. Fuss Attorney



9075 W. Diablo Drive., Suite 302 | Las Vegas, NV 89148

Tel: (702) 804-0706 | Fax: (702) 804-0798

From: Steve Brazelton < sbrazelton@brazeltonlaw.com >

Sent: Thursday, February 24, 2022 4:15 PM **To:** Chad D. Fuss <<u>cfuss@springelfink.com</u>>

Cc: Nakesha Duncan-Perez < nduncan@springelfink.com >; Ella Wilczynski

<ewilczynski@springelfink.com>; GuerravDematicCorpetalZ6182496@projects.filevine.com

Subject: Re: Guerra - Motion to Compel Financial Records

Chad, that is fine.

Steven P. Brazelton

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On Thu, Feb 24, 2022 at 4:00 PM Chad D. Fuss < <u>cfuss@springelfink.com</u> > wrote: Steve-
Will you stipulate to allow us to file our response to the Motion to Compel re financial records to Monday?
Thank you.
Chad D. Fuss Attorney Springel & Fink = 9075 W. Diablo Drive., Suite 302 Las Vegas, NV 89148

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Steven P. Brazelton

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